

1 LAURENCE F. PULGRAM (CSB No. 115163)  
lpulgram@fenwick.com  
2 SHANNON E. TURNER (CSB No. 310121)  
sturner@fenwick.com  
3 FENWICK & WEST LLP  
555 California Street, 12<sup>th</sup> Floor  
4 San Francisco, CA 94104  
Telephone: 415.875.2300  
5 Facsimile: 415.281.1350

6 ATTORNEYS FOR DEFENDANT  
IMPERVA, INC.

7  
8 UNITED STATES DISTRICT COURT  
9  
10 NORTHERN DISTRICT OF CALIFORNIA

11 JULIEN POINSIGNON, on behalf of himself, all  
12 others similarly situated,

13 Plaintiff,

14 v.

15 IMPERVA, INC., a Delaware corporation;  
16 INSPIRITY PEO SERVICES, L.P., a Delaware  
limited liability partnership; and DOES 1 through  
50, inclusive,

17 Defendants.  
18

Case No.: 3:17-cv-05653-EMC

**STIPULATION TO EXTEND TIME TO  
RESPOND TO FIRST AMENDED  
COMPLAINT**

19 Pursuant to Federal Rule of Civil Procedure 6(b) and Local Rules 6-1 and 6-2, Plaintiff  
20 Julien Poinسیون (“Plaintiff”) and Defendant Imperva, Inc. (“Imperva”) by and through their  
21 respective counsel, hereby agree and stipulate, and request an order from the Court, extending  
22 Imperva’s time to respond to the First Amended Complaint. In support of this request, the parties  
23 stipulate as follows:

24 WHEREAS, on April 9, 2018, the Court dismissed the Complaint in its entirety, with  
25 leave to amend as to certain claims (Dkt. 34);

26 WHEREAS, on May 10, 2018, Plaintiff filed the First Amended Complaint (Dkt. 35);  
27  
28

1 WHEREAS, Imperva's deadline to answer or otherwise respond to the First Amended  
2 Complaint is currently May 24, 2018;

3 WHEREAS, the parties have, pursuant to the ADR procedures and orders of this Court,  
4 scheduled a mediation for June 4, 2018 in San Francisco, California before Michael Dickstein;

5 WHEREAS, in light of the scheduled mediation, the parties wish to extend Imperva's  
6 deadline for responding to the First Amended Complaint until after time to complete the  
7 mediation, specifically, to June 18, 2018;

8 WHEREAS, the parties have conferred and agree that this stipulated extension will not  
9 cause prejudice to any of the parties, and that there is good cause for the requested continuance;

10 WHEREAS, the Parties previously stipulated to extend the time for Imperva to respond to  
11 the Complaint (Dkt. 7) and to reschedule the motion to dismiss hearing and initial case  
12 management conference (Dkt. 18), and there have been no other time modifications in this case  
13 by stipulation or Court order; and

14 WHEREAS, this short extension will not substantively affect the overall case schedule,  
15 particularly given the preliminary stage of this litigation and benefits of early mediation.

16 **NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, by and  
17 between Plaintiff and Imperva, Inc., through their respective counsel, as follows:

18 1. The deadline for Defendant Imperva, Inc. to respond to the First Amended  
19 Complaint shall be extended to and including June 18, 2018.

20  
21 Dated: May 21, 2018

FENWICK & WEST LLP

22  
23 By: /s/ Shannon E. Turner  
24 Shannon E. Turner

25 Attorneys for Defendant  
26 IMPERVA, INC.  
27  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Dated: May 21, 2018

SETAREH LAW GROUP

By: /s/ H. Scott Leviant  
H. Scott Leviant

Attorneys for Plaintiff  
JULIEN POINSIGNON

**ATTORNEY ATTESTATION**

I hereby attest that the concurrence in the filing of this document has been obtained from its signatory.

/s/ Shannon E. Turner  
Shannon E. Turner

**[PROPOSED] ORDER**

Upon consideration of the Stipulation to Extend Time to Respond to First Amended Complaint filed by Plaintiff Julien Poinsignon and Defendant Imperva, Inc., **IT IS HEREBY ORDERED** as follows:

1. The deadline for Defendant Imperva, Inc. to respond to the First Amended Complaint shall be extended to and including June 18, 2018.

Dated: 5/24, 2018

